



February 15, 2010  
Via ECFS

Ms. Marlene H. Dortch, FCC Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

**RE: EB Docket No. 06-36**  
**2009 CPNI Certification Filing for National Brands, Inc.**  
**d/b/a Sharenet Communications Company**  
**Form 499 Filer ID 803190**

Dear Ms. Dortch:

In accordance with Federal Communications Commission's Enforcement Advisory No. 2010-01, DA 10-91, EB Docket No. 06-36, released January 15, 2010 and pursuant to 47 C.F.R. § 64.2009(e), National Brands, Inc. d/b/a Sharenet Communications Company files its Certification of Customer Proprietary Network information (CPNI) for the year 2009. Please include this Certification in EB Docket No. 06-36.

Any questions you may have concerning this filing may be directed to me at 470-740-3002 or via email to [cwrightman@tminc.com](mailto:cwrightman@tminc.com).

Sincerely,

/s/Connie Wightman  
Consultant to National Brands, Inc. d/b/a Sharenet Communications Company

CW/lw

Attachments

cc: Best Copy and Printing - (FCC@BCPIWEB.COM)  
cc: FCC Enforcement Bureau (2 Copies)  
cc: Gary Joseph, Sharenet  
file: NTBR - FCC  
tms: FCCx1001

## EB Docket 06-36

**Attachments:** Accompanying Statement explaining CPNI procedures  
Explanation of actions taken against data brokers (not applicable, see Statement)  
Summary of customer complaints (not applicable, See Statement)

**Attachment A**  
**Statement of CPNI Procedures and Compliance**

Attachment A  
Statement of CPNI Procedures and Compliance  
National Brands, Inc. d/b/a Sharenet Communications Company

**USE OF CPNI**

Sharenet Communications Company follows the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

Sharenet does have CPNI, including call detail information concerning the calls made using the Company's services. Sharenet will only disclose call detail information over the telephone in response to a customer-initiated contact if Sharenet can authenticate the identity of the caller. If the customer can provide call detail information to Sharenet during a customer-initiated call without Sharenet's assistance, then Sharenet is permitted to discuss the call detail information provided by the customer

**PROTECTION OF CPNI**

As set forth below, Sharenet has put into place processes to safeguard its customers' CPNI (including call detail information) from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to customer CPNI. The company trains its employees regarding its procedures for protecting CPNI on an ongoing basis and monitors the interactions of its employees with customers to insure that procedures are being followed.

**DISCLOSURE OF CALL DETAIL OVER PHONE**

All customers will be properly authenticated before Sharenet will disclose CPNI in response to a telephone call. Sharenet follows the applicable rules set forth in 47 CFR Subpart U, including the implementation of authentication procedures that do not require the use of readily available biographical information or account information and customer notification of account changes.

**DISCLOSURE OF CPNI ONLINE**

Sharenet does not disclose CPNI through any online services.

**DISCLOSURE OF CPNI AT RETAIL LOCATIONS**

Sharenet does not have any retail locations and therefore does not disclose CPNI in-store.

### **NOTIFICATION TO LAW ENFORCEMENT**

Sharenet has in place procedures to notify law enforcement in the event of a breach of customers' CPNI and to ensure that customers are not notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement. Sharenet maintains records of all breaches discovered and notifications made to the USSS and the FBI, and to customers .

### **ACTIONS AGAINST DATA BROKERS**

Sharenet has not taken any actions against data brokers in the last year.

### **CUSTOMER COMPLAINTS ABOUT CPNI BREACHES**

Sharenet did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2009.

### **INFORMATION ABOUT PRETEXTERS**

Sharenet has not developed any information with respect to the processes pretexters are using to attempt to access CPNI but does take steps to protect CPNI by adhering to the guidelines described herein for access to CPNI. Sharenet is committed to notify the FCC of any new or novel methods of pretexting that it encounters and of any actions Sharenet takes against pretexters and data brokers.